

LAGOMARSINO LAW
3005 W. Horizon Ridge Pkwy., # 241, Henderson, NV 89052
Telephone: (702) 383-2864 Facsimile: (702) 383-0065

LAGOMARSINO LAW
ANDRE M. LAGOMARSINO, ESQ.
Nevada Bar No. 6711
CORY M. FORD, ESQ.
Nevada Bar No. 15042
3005 W. Horizon Ridge Pkwy, #241
Henderson, Nevada 89052
Telephone: (702) 383-2864
Facsimile: (702) 383-0065
AML@lagomarsinolaw.com
Cory@lagomarsinolaw.com
Attorneys for Plaintiff Michael Brown

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL BROWN, an individual,

Plaintiff,

vs.

CASE NO: 2:19-cv-01663-JCM-DJA

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; LAS VEGAS
METROPOLITAN POLICE OFFICER ROSE,
individually; LAS VEGAS METROPOLITAN
POLICE OFFICER PIEKARSKI, individually;
LAS VEGAS METROPOLITAN POLICE
OFFICER OSWALD, individually; and LAS
VEGAS METROPOLITAN POLICE OFFICER
MENDEZ, individually,

Defendants.

STIPULATION AND ORDER
TO EXTEND BRIEFING DEADLINES TO
DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT (ECF NO. 31)

(First Request)

WHEREAS Defendants Officer Kevin Mendez, Officer Zachary Piekarski, Officer Michael Rose, Officer Coleman Oswald, and the Las Vegas Metropolitan Police Department ("LVMPD") (collectively "LVMPD Defendants") filed a Motion for Summary Judgment on October 12, 2020 (ECF No. 31).

///

///

LAGOMARSINO LAW
3005 W. Horizon Ridge Pkwy., # 241, Henderson, NV 89052
Telephone: (702) 383-2864 Facsimile: (702) 383-0065

1 Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for
2 Plaintiff to file his Response to LVMPD Defendants' Motions for Summary Judgment. The current
3 deadline for Plaintiff to respond to LVMPD Defendants' Motions for Summary Judgment is
4 **November 2, 2020**. The new deadline for Plaintiff to respond to LVMPD Defendants' Motion for
5 Summary Judgment will be **November 23, 2020**. As such, the new deadline for LVMPD
6 Defendants' Reply brief will be **December 21, 2020**.

7
8 This extension is the first request and is not for the purpose of delay. Good cause exists
9 because one (1) of the legal assistants for Plaintiff's counsel has suddenly been quarantined due to
10 testing positive for COVID-19. As a result, Plaintiff's counsel's entire firm was forced to undergo
11 immediate COVID-19 testing, which resulted in the attorney that was tasked with drafting the
12 response brief having to work from home.

13
14 Additionally, the partner of the firm for Plaintiff is unavailable for roughly two (2) weeks
15 which resulted in the attorney that was tasked with drafting the response brief having to cover
16 multiple appearances for the partner of Plaintiff's counsel's firm.

17 Due to these unfortunate circumstances, the drafting attorney's availability during this time
18 has been limited to devote adequate time to crafting the response to LVMPD Defendants' brief as
19 he has been forced take on additional briefing and discovery efforts as well as cover multiple
20 depositions in other cases that would have otherwise been allocated for the drafting of a response
21 brief (all while having to coordinate these things away from home).

22
23 Furthermore, LVMPD Defendants' motion is extensive and voluminous, which requires a
24 thorough and thoughtful response by Plaintiff.

25 ///

26 ///

27 ///

1 **IT IS SO STIPULATED AND AGREED.**

2 DATED this 16th day of October, 2020.

DATED this 16th day of October, 2020.

3 **LAGOMARSINO LAW**

KAEMPFER CROWELL

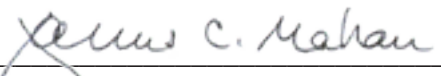
4 /s/ Cory M. Ford

/s/ LYSSA ANDERSON

5 Andre M. Lagomarsino, Esq. (#6711)
6 Cory M. Ford, Esq. (#15042)
7 3005 W. Horizon Ridge Pkwy., #241
8 Henderson, Nevada 89052
9 *Attorneys for Plaintiff Michael Brown*

Lyssa S. Anderson, Esq. (#5781)
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Attorney for LVMPD Defendants

9 **IT IS SO ORDERED.**

10 
11 UNITED STATES DISTRICT COURT JUDGE

12 DATED: October 21, 2020

LAGOMARSINO LAW
3005 W. Horizon Ridge Pkwy., # 241, Henderson, NV 89052
Telephone: (702) 383-2864 Facsimile: (702) 383-0065